



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JMK/WMP
F. #2013R00505

*271 Cadman Plaza East
Brooklyn, New York 11201*

December 4, 2014

BY HAND

Michelle A. Gelernt, Esq.
Federal Defenders of New York
One Pierrepont Plaza, 16th floor
Brooklyn, New York 11201

Re: United States v. Robert Bandfield
Criminal Docket No. 14-476 (ILG)

Dear Ms. Gelernt:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter. The materials in this production are produced on two discs and Bates stamped EDNY-IPC-000000207 – EDNY-IPC-000006888. This disclosure supplements the government's earlier disclosure under cover of letter dated October 10, 2014. The government again requests reciprocal discovery. The enclosed discs contain copies of the following materials:

Disc One (Email Search Warrant Productions)

- Emails from GoDaddy obtained pursuant to a search warrant signed on February 3, 2014 (folder labeled EDNY-IPC-000000207);
- Emails from Microsoft Corporation (MSN-Hotmail) obtained pursuant to a search warrant signed on February 3, 2014 (folder labeled EDNY-IPC-000000208);
- Emails from Network Solutions LLC obtained pursuant to a search warrant signed on February 3, 2014 (folder labeled EDNY-IPC-000000209); and
- Emails from Yahoo! Inc. obtained pursuant to a search warrant signed on February 3, 2014 (folder labeled EDNY-IPC-000000210).

Disc Two (SEC Productions)

- Records from Cannabis-RX (CANA) regarding claims made in press releases, including information on properties acquired in 2013 and 2014, notes sold to investors, and the \$14 million line of credit (Bates stamped EDNY-IPC-000000211 – EDNY-IPC-000004426);

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- Records from the transfer agent concerning Cannabis-RX (Bates stamped EDNY-IPC-000004427 – EDNY-IPC-000005666);
- Records from GoDaddy (produced to the SEC) concerning account information (Bates stamped EDNY-IPC-000005667 – EDNY-IPC-000006656);
- Records from Network Solutions (produced to the SEC) concerning account information for applications@ipcoffshore.com (Bates stamped EDNY-IPC-000006657 – EDNY-IPC-000006660);
- Records from Research in Motion (RIM) (produced to the SEC) concerning account information for badewitt@yahoo.com and another account (files labeled EDNY-IPC-000006661 – EDNY-IPC-000006662); and
- Records from Scottsdale Capital Advisors (produced to the SEC) concerning Legacy Global Markets (Bates stamped EDNY-IPC-000006663 – EDNY-IPC-000006888).

If you have any questions or requests regarding further discovery, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH
United States Attorney
Eastern District of New York

By: /s/
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Enclosures

Cc: Clerk of Court (ILG) (by ECF) (w/o enclosures)